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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12
13 Plaintiff,
14 v.
15 JOHNNY CHEN,
16 Defendant.

Case No. 2:23-mj-00420-MDC

**STIPULATION TO EXTEND TIME
TO SATISFY OUTSTANDING
WARRANT**

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, through Kimberly Frayn, Assistant United States Attorney, counsel for
19 the United States of America, and Rene L. Valladares, Federal Public Defender, and Aden
20 Kebede, Assistant Federal Public Defender, counsel for Johnny Chen, that this Court amend
21 the conditions of Pretrial Release by extending period to resolve an outstanding warrant.

22 This Stipulation is entered into for the following reasons:

23 1. On October 12, 2023, this Court modified Mr. Chen's condition of release to
24 add a condition that he shall satisfy all outstanding warrants within 90 days and provide
25 verification to Pretrial Services or the supervising officer. The Court further ordered that Mr.
26 Chen may travel to New Jersey for the purpose of court only.

2. Since that time, Mr. Chen, with the help of the parties, attempted to resolve his warrant remotely, but was unable to do so. Currently, Mr. Chen is working with an attorney in New Jersey to resolve the warrant.

3. An additional 90 days is needed for Mr. Chen to resolve the outstanding warrant.

4. Pretrial Services does not oppose the extension of time.

5. The parties agree to the extension.

DATED this 4th day of January 2024

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

By /s/ Aden Kebede

By /s/ Kimberly Frayn

ADEN KEBEDE
Assistant Federal Public Defender

Kimberly Frayn
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4

5 Plaintiff,

6 v.

7 JOHNNY CHEN,
8

9 Defendant.

Case No. 2:23-mj-00420-MDC

10 **ORDER**

11 IT IS HEREBY ORDERED, that this Court modifies Mr. Chen's Pretrial Release
12 conditions to extend the 90 day period within which he shall satisfy all outstanding warrants
13 and provide verification to Pretrial Services or the supervising officer by an additional 90 days
14 to on or before April 9, 2024.

15 DATED this 11th day of January 2024.

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20 UNITED STATES MAGISTRATE JUDGE
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